

Robert A. Julian (SBN 99469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
San Francisco, CA 94111
Telephone: 628.208.6434
Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Boulevard, Suite 1400
Los Angeles, CA 90025
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: lattard@bakerlaw.com

Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF MOTION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS FOR ENTRY OF A
PROTECTIVE ORDER**

Date: June 26, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 19, 2019, 4:00
p.m. (Pacific Time)

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E
2 Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession
3 (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a
4 voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy**
5 **Code**”) with the United States Bankruptcy Court for the Northern District of California (San
6 Francisco Division) (the “**Bankruptcy Court**”).

7 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
8 June 26, 2019 at 9:30 a.m. (Pacific Time) (the “**Omnibus Hearing**”) in the courtroom of the
9 Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450
10 Golden Gate Avenue, San Francisco, California 94102.

11 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters scheduled for
12 the Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Motion of the Official*
13 *Committee of Tort Claimants for Entry of a Protective Order*, which was filed on June 5, 2019 (the
14 “**Motion**”).

15 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion
16 must be in writing, filed with the Bankruptcy Court, and served on the counsel for the Official
17 Committee of Tort Claimants at the above-referenced addresses so as to be received by no later
18 than **4:00 p.m. (Pacific Time) on June 19, 2019**. Any oppositions or responses must be filed and
19 served on all “Standard Parties” as defined in, and in accordance with, the *Second Amended Order*
20 *Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 (ECF
21 No. 1996) (the “**Case Management Order**”). **Any relief requested in the Motion may be**
22 **granted without a hearing if no opposition is timely filed and served in accordance with the**
23 **Case Management Order**. In deciding the Motion, the Court may consider any other document
24 filed in these Chapter 11 Cases and related Adversary Proceedings.

25 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting papers
26 can be viewed and/or obtained: (i) by accessing the Court’s website at
27 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
28 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
29 Clerk LLC, at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
30 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
31 pginfo@primeclerk.com. Note that a PACER password is needed to access documents on the
32 Bankruptcy Court’s website.

33 Dated: June 5, 2019

BAKER & HOSTETLER LLP

By: /s/ Robert Julian

*Counsel for The Official Committee of Tort
Claimants*